



Wisconsin
Right to Life, Inc.

**POLITICAL
ACTION
COMMITTEE**

Chair
Michael Moegenburg
Sheboygan

Andrew M. Bath
Milwaukee

James Erceg
Milwaukee

Betty Tassoul
Green Bay

Al Christianson
Madison

Donald Zahalka
Oshkosh

Jeanne Zahalka
Oshkosh

Pac Treasurer
Richard Fox

Legislative Pac Director
Susan Anderson

RECEIVED
FEDERAL ELECTION
COMMISSION #618 ROOM

Nov 23 1 09 PM '98

November 16, 1998

Richard Ng
Federal Election Commission
Washington, DC 20463

Dear Mr. Ng,

This letter is in response to your letter dated November 10, 1998 where you ask us to make some adjustments in our report based on your analysis. You also ask whether our connected organization (corporation) made election expenditures. The following explanations, along with attachments, address the items in your letter.

1. Our Connected Organization, Wisconsin Right to Life PAC, did not, nor has it ever, made illegal election expenditures. The expenditures to which you refer (see attachments) are payments the Wisconsin Right to Life PAC made to Wisconsin Right to Life, Inc. to rent Wisconsin Right to Life Inc's mailing list. Election law forbids Wisconsin Right to Life, Inc. from making any contributions for election activities. In our organization, the mailing list belongs to Wisconsin Right to Life, Inc. In order for the Wisconsin Right to Life PAC to use this list for election activities, the Wisconsin Right to Life PAC must rent the list from Wisconsin Right to Life, Inc. at fair market value. The Wisconsin Right to Life PAC expenditures you noted reflect the payments (in installments) the PAC made to the Wisconsin Right to Life, Inc. to rent the list.

If Wisconsin Right to Life, Inc. simply gave the list to the Wisconsin Right to Life PAC, then it would be clearly illegal because Wisconsin Right to Life, Inc. would be giving something of value to the Wisconsin Right to Life PAC. Wisconsin Right to Life, Inc. and Wisconsin Right to Life PAC, however, have been diligent in making sure all transactions are in compliance with election law.

The Wisconsin Right to Life PAC has been renting the mailing list from Wisconsin Right to Life, Inc. in exactly the same way for years. The FEC and the State Elections Board (when we are dealing with state candidates) have always recognized this transaction as legal, as well they should.

2. I have corrected the Detailed Summary Page, lines 30 and 31. That amount should have been \$38,635.41, as it appears on the Summary Cover Page.

3. I am unclear as to the corrections needed on Schedule E. According to the copy of the report I have retained, all information is provided. Please advise if I am incorrect.

4. In regard to the omission of the aggregate year-to-date totals, that problem is now being corrected. Our organization went to a new computer system and all programs were designed by one firm. Unfortunately, the program supplied to us for Schedule A contributions was lacking an entry for aggregate contributions and had other problems, as well. We have hired an individual to get the Schedule A format back to the way it was prior to going to the new system. Our next report, due to be filed by December 3, will have the correct format. I do apologize for the delay in correcting this...it has been extremely frustrating for us here, as well.

Sincerely,

Susan Armacost

Susan Armacost
Assistant Treasurer

Amended

**DETAILED SUMMARY PAGE
OF RECEIPTS AND DISBURSEMENTS
PAGE 2, FEC FORM 3X**

(revised 11/81)

NAME OF COMMITTEE	REPORT COVERING PERIOD		
	FROM	TO	
<u>Wisconsin Right to Life PAC</u>	<u>July 1, 1998</u>	<u>August 19, 1998</u>	
	COLUMN A	COLUMN B	
	Total This Period	Calendar Year	
I. Receipts			
11. Contributions (other than loans) From:			
a. Individual/Persons Other Than Political Committees			
i. Itemized (use Schedule A)	53855.54	56542.04	11(a)(i)
ii. Unitemized	0	0	11(a)(ii)
iii. Total (add i and ii) >	53855.54	56542.04	11(a)(iii)
b. Political Party Committees	0	0	11(b)
c. Other Political Committees (such as PACs)	0	0	11(c)
d. Total Contributions (add a i, b and c) >	53855.54	56542.04	11(d)
12. Transfers From Affiliated/Other Party Committees	0	0	12
13. All Loans Received	0	0	13
14. Loan Repayments Received	0	0	14
15. Offsets To Operating Expenditures (Refunds, Rebates, etc.)	0	0	15
16. Refunds of Contributions Made to Federal Candidates and Other Political Committees	0	0	16
17. Other Federal Receipts (Dividends, Interest, etc.)	808	13192	17
18. Transfers from Nonfederal Account for Joint Activity	0	0	18
19. Total Receipts (add 11d, 12, 13, 14, 15, 16, 17, and 18) >	53863.72	56555.46	19
20. Total Federal Receipts (subtract line 18 from line 19) >	53863.72	56555.46	20
II. Disbursements			
21. Operating Expenditures:			
a. Shared Federal/Non-Federal Activity (from Schedule H4)			
i. Federal Share	0	0	21(a)(i)
ii. Non-Federal Share	0	0	21(a)(ii)
b. Other Federal Operating Expenditures	1.60	722.60	21(b)
c. Total Operating Expenditures (add a i, a ii, and b) >	1.60	722.60	21(c)
22. Transfers to Affiliated/Other Party Committees	0	0	22
23. Contributions to Federal Candidates/Committees and Other Political Committees	0	0	23
24. Independent Expenditures (use Schedule E)	23089.08	23347.48	24
25. Coordinated Expenditures Made by Party Committees (2 U.S.C. 441a(d)) (use Schedule F)	0	0	25
26. Loan Repayments Made	0	0	26
27. Loans Made	0	0	27
28. Refunds of Contributions To:			
a. Individual/Persons Other Than Political Committees	0	0	28(a)
b. Political Party Committees	0	0	28(b)
c. Other Political Committees (such as PACs)	0	0	28(c)
d. Total Contribution Refunds (add a, b and c) >	0	0	28(d)
29. Other Disbursements	14564.33	14564.33	29
30. Total Disbursements (add 21c, 22, 23, 24, 25, 26, 27, 28d, and 29) >	37655.01	38635.41	30
31. Total Federal Disbursements (subtract line 21 a ii from line 30) >	37653.41	38635.41	31
III. Net Contributions/Operating Expenditures			
32. Total Contributions (other than loans)(from line 11d)	53855.54	56542.04	32
33. Total Contribution Refunds (from line 28d)	0	0	33
34. Net Contributions (other than loans)(subtract line 33 from 32)	53855.54	56542.04	34
35. Total Federal Operating Expenditures (add 21 a i and 21 b) >	1.80	822.60	35
36. Offsets to Operating Expenditures (from line 15)	0	0	36
37. Net Operating Expenditures (subtract line 36 from 35) >	1.80	822.60	37

SCHEDULE E

Mr. Ng -
pls. note what
is written as
purpose of expenditure

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.D. No.		
Wisconsin Right to Life Fed PAC		C0017328		
Full Name, Mailing Address & ZIP Code of Each Payor	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
A to Z Printing 6535 River Pkwy Wauwatosa, Wisc. 53213	printing of brochure	7/2/98	\$3442.56	U.S. Senate Mark Neumann - support Russ Feingold - oppose <input type="checkbox"/> Support <input type="checkbox"/> Oppose
Wisconsin Right to Life 10625 W. North Ave Milwaukee, Wisc. 53226	The wages for time spent on direct election activities	7/7/98	\$225.11	U.S. Senate Mark Neumann - support Russ Feingold - oppose 8th Cong. Dist Mark Green - support Jay Johnson - oppose
The Right Stuff 4102 Miami St Omaha, Neb. 68111-3433	Down payment for bumper stickers.	7/9/98	\$500.00	U.S. Senate Mark Neumann - support Russ Feingold - oppose
Wisconsin Right to Life 10625 W. North Ave. Milwaukee, Wisc. 53226	The WRL PAC rents the WRA/INC list for use to support & oppose various federal candidates. This expenditure is the first installment toward full payment	7/17/98	\$5000.00	U.S. Senate Mark Neumann - support Russ Feingold - oppose 8th CD Mark Green - support Jay Johnson - oppose 7th CD Scott West - support David Obey - oppose 1st CD Paul Ryan - support Lydia Spangher - oppose
SUBTOTAL of Itemized Independent Expenditures			9117.67	
SUBTOTAL of Unitemized Independent Expenditures				
TOTAL Independent Expenditures				

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, participation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not include the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature: Susan M. Amundson 8/25/98

Subscribed and sworn to before me this 25th day of August 1998

My Commission Expires: 2 permanent
Notary Public: [Signature]

SCHEME E

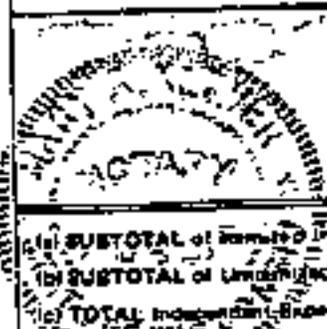
ITEMIZED INDEPENDENT EXPENDITURES

Page 2 of 4 Pages

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.D. No.		
Wisconsin Right to Life Federal PAC		C 0017328		
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Wisconsin Right to Life, Inc. 10625 W. North Ave. Milwaukee, Wisc 53226	wages for time spent on direct election activities.	7/22/98	\$977.80	U.S. Senate Mark Neumann - sup Russ Feingold - opp. Mark Green sup. Jay Johnson - opp 1 CD Paul Ryan - sup Lydia Spottswood - opp.
Wisconsin Right to Life, Inc. 10625 W. North Ave. Milwaukee, Wisc 53226	fund payment for rental of WRL Inc. list	8/3/98	\$2000.00	U.S. Senate Mark Neumann - sup Russ Feingold - opp. 8th CD Mark Green, sup. Jay Johnson, opp 7 CD Scott West, sup. David Obey, opp 1 CD Paul Ryan - sup Lydia Spottswood - opp.
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose

FNU



(a) SUBTOTAL of Itemized Independent Expenditures \$2977.80

(b) SUBTOTAL of Unitemized Independent Expenditures \$

(c) TOTAL Independent Expenditures \$

Under penalty of perjury I certify that the independent expenditures reported herein were not made in observation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not make the financing of dissemination, distribution, or republication in whole or in part of any campaign material prepared by the candidate, his campaign committee, or their agents.

William M. Omerout 8/25/98
Signature Date

Subscribed and sworn to before me this 25th day of August 1998
By Commission Expires 8/25/98
[Signature]
NOTARY PUBLIC

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full)		I.D. No.		
Wisconsin Right to Life Political Action Committee		C0017328		
Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Wisconsin Right to Life, Inc. 10625 W. North Ave Milwaukee, WI 53226	Third payment for rental <u>WRL/Inc. list</u>	8/18/98	\$7000.00	U.S. Senate Mark Neumann - SUPP. Russ Feingold - OPP. 8th CD Mark Green - SUPP. Jay Johnson - OPP. 7th CD
Wisconsin Right to Life, Inc. 10625 W. North Ave Milwaukee, WI 53226	wages for time spent on direct election activities	8/19/98	\$665.00	Scott West - SUPP. David Obey - OPP. 1st CD Paul Ryan - SUPP. Byrd Spotswood - OPP.
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
				<input type="checkbox"/> Support <input type="checkbox"/> Oppose
(a) SUBTOTAL of Itemized Independent Expenditures			\$ 7665.00	
(b) SUBTOTAL of Unitemized Independent Expenditures			\$	23089.08
(c) TOTAL Independent Expenditures				



Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Susan M. Arnold 8/25/98
Signature Date

Subscribed and sworn to before me this 25th day of August, 1998

My Commission expires is permanent
[Signature]
NOTARY PUBLIC

920 SCHEDULE D

(Revised 3/80)

Excluding Loans

FD-107

Use separate sheet for each numbered line

Name of Committee (In Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
<p>Wisconsin Right to Life PAC A. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Wisconsin Right to Life, Inc. 10625 W. North Ave. Milwaukee, Wisc 53226</p>	\$ 5325	\$ 8675	\$ 14,000	0
<p>Nature of Debt (Purpose): Rental of mailing list *</p> <p>* On our last report, we indicated the first installment due for rental of the WRL, Inc list. However, in this period, the PAC was able to pay the entire amount due of \$14,000.</p>				
<p>C. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A to Z Printing 6535 River PKWY Wauwatosa, WI 53213</p>	\$ 3442.56	0	3442.56	0
<p>Nature of Debt (Purpose): Printing of brochure</p> <p>D. Full Name, Mailing Address and ZIP Code of Debtor or Creditor Alan Newirth (address not available - will put in next report)</p>				
<p>E. Full Name, Mailing Address and ZIP Code of Debtor or Creditor A to Z Printing 6535 River PKWY Wauwatosa, WI 53213</p>	\$ (estimate) 412.00	0	0	Estimate 412.00
<p>Nature of Debt (Purpose): Type setting</p> <p>F. Full Name, Mailing Address and ZIP Code of Debtor or Creditor T & mail 2738 S. 163rd St. New Berlin, Wisc. 53151</p>				
<p>Nature of Debt (Purpose): mailing service chgs</p>	\$ estimate 1150	0	0	\$ 1150 estimate
<p>1) SUBTOTALS This Period This Page (optional)</p>				
<p>2) TOTALS This Period (last page in this line only)</p>				
<p>3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)</p>				
<p>4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)</p>				

